

Exhibit A

Case No.11-cv-01814

From: Bill Mori (billmori2@gmail.com)

To: crystalleija@yahoo.com

Date: Sunday, July 22, 2018, 1:31 PM PDT

returns for the years 2016, 2015 and 2014



returns.pdf
1.2MB

For the year Jan. 1–Dec. 31, 2014, or other tax year beginning , 2014, ending , 20

See separate instructions.

Your first name and initial
 DEMAS W

Last name
 YAN

Your social security number
 XXX-XX-5968

If a joint return, spouse's first name and initial
 MEI

Last name
 FANG

Spouse's social security number
 XXX-XX-0299

Home address (number and street), if you have a P.O. box, see instructions.
 1433 7TH AVENUE

Apt. no.

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions).
 SAN FRANCISCO CA 94122

Foreign country name Foreign province/state/country Foreign postal code

Make sure the SSN(s) above and on line 6c are correct.

Presidential Election Campaign
 Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund.
☐ You ☐ Spouse

Filing Status

1 ☐ Single

2 ☒ Married filing jointly (even if only one had income)

3 ☐ Married filing separately. Enter spouse's SSN above and full name here. ▶

4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here. ▶

5 ☐ Qualifying widow(er) with dependent child

Check only one box.

Exemptions

6a ☒ Yourself. If someone can claim you as a dependent, do not check box 6a

b ☒ Spouse

Boxes checked on 6a and 6b 2

No. of children on 6c who:
 • lived with you 3
 • did not live with you due to divorce or separation (see instructions)

Dependents on 6c not entered above

Add numbers on lines above ▶ 5

(1) First name	Last name	(2) Dependent's social security number	(3) Dependent's relationship to you	(4) <input checked="" type="checkbox"/> if child under age 17 qualifying for child tax credit (see instructions)
C	YAN	XXX-XX-9865	Daughter	<input checked="" type="checkbox"/>
M	YAN	XXX-XX-1556	Daughter	<input checked="" type="checkbox"/>
I	YAN	XXX-XX-7276	Daughter	<input checked="" type="checkbox"/>

If more than four dependents, see instructions and check here ☐

d Total number of exemptions claimed

Income

7 Wages, salaries, tips, etc. Attach Form(s) W-2 7 15,683.

8a Taxable interest. Attach Schedule B if required 8a

b Tax-exempt interest. Do not include on line 8a 8b

9a Ordinary dividends. Attach Schedule B if required 9a

b Qualified dividends 9b

10 Taxable refunds, credits, or offsets of state and local income taxes 10

11 Alimony received 11

12 Business income or (loss). Attach Schedule C or C-EZ 12

13 Capital gain or (loss). Attach Schedule D if required. If not required, check here ☐ 13 -3,000.

14 Other gains or (losses). Attach Form 4797 14

15a IRA distributions 15a b Taxable amount 15b

16a Pensions and annuities 16a b Taxable amount 16b

17 Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E 17

18 Farm income or (loss). Attach Schedule F 18

19 Unemployment compensation 19 2,034.

20a Social security benefits 20a b Taxable amount 20b

21 Other income. List type and amount Non-employee compensation from 1099-Misc 21 12,000.

22 Combine the amounts in the far right column for lines 7 through 21. This is your total income ▶ 22 26,717.

Adjusted Gross Income

23 Educator expenses 23

24 Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ 24

25 Health savings account deduction. Attach Form 8889 25

26 Moving expenses. Attach Form 3903 26

27 Deductible part of self-employment tax. Attach Schedule SE 27

28 Self-employed SEP, SIMPLE, and qualified plans 28

29 Self-employed health insurance deduction 29

30 Penalty on early withdrawal of savings 30

31a Alimony paid b Recipient's SSN ▶ 31a

32 IRA deduction 32

33 Student loan interest deduction 33

34 Tuition and fees. Attach Form 8917 34

35 Domestic production activities deduction. Attach Form 8903 35

36 Add lines 23 through 35 36

37 Subtract line 36 from line 22. This is your adjusted gross income ▶ 37 26,717.

Form 1040 Department of the Treasury — Internal Revenue Service (99) 2015 U.S. Individual Income Tax Return		OMB No. 1545-0074	IRS Use Only—Do not write or staple in this space.
For the year Jan. 1–Dec. 31, 2015, or other tax year beginning		2015, ending	
Your first name and initial DEMAS W		Last name YAN	
If a joint return, spouse's first name and initial MEI		Last name FANG	
Home address (number and street). If you have a P.O. box, see instructions. 1433 7TH AVENUE		Apt. no.	
City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions). SAN FRANCISCO CA 94122		Foreign country name	
Foreign province/state/country		Foreign postal code	

See separate instructions.

Your social security number

XXX-XX-5968

Spouse's social security number

XXX-XX-0299

▲ Make sure the SSN(s) above and on line 6c are correct.

Presidential Election Campaign

Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund.

☐ You ☐ Spouse

Filing Status

Check only one box.

- 1 ☐ Single
- 2 ☒ Married filing jointly (even if only one had income)
- 3 ☐ Married filing separately. Enter spouse's SSN above and full name here. ▶
- 4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here. ▶
- 5 ☐ Qualifying widow(er) with dependent child

Exemptions

If more than four dependents, see instructions and check here ▶ ☐

6a <input checked="" type="checkbox"/> Yourself. If someone can claim you as a dependent, do not check box 6a				Boxes checked on 6a and 6b	2
b <input checked="" type="checkbox"/> Spouse				No. of children on 6c who:	
				• lived with you	3
				• did not live with you due to divorce or separation (see instructions)	
				Dependents on 6c not entered above	
				Add numbers on lines above ▶	5

c Dependents:		(2) Dependent's social security number	(3) Dependent's relationship to you	(4) <input checked="" type="checkbox"/> if child under age 17 qualifying for child tax credit (see instructions)
(1) First name	Last name			
C	YAN	XXX-XX-9865	Daughter	<input checked="" type="checkbox"/>
M	YAN	XXX-XX-1556	Daughter	<input checked="" type="checkbox"/>
I	YAN	XXX-XX-7276	Daughter	<input checked="" type="checkbox"/>
				<input type="checkbox"/>

d Total number of exemptions claimed

Income

Attach Form(s) W-2 here. Also attach Forms W-2G and 1099-R if tax was withheld.

If you did not get a W-2, see instructions.

7	Wages, salaries, tips, etc. Attach Form(s) W-2	7	28,109.
8a	Taxable interest. Attach Schedule B if required	8a	
b	Tax-exempt interest. Do not include on line 8a	8b	
9a	Ordinary dividends. Attach Schedule B if required	9a	
b	Qualified dividends	9b	
10	Taxable refunds, credits, or offsets of state and local income taxes	10	0.
11	Alimony received	11	
12	Business income or (loss). Attach Schedule C or C-EZ	12	38,132.
13	Capital gain or (loss). Attach Schedule D if required. If not required, check here ▶ <input type="checkbox"/>	13	-3,000.
14	Other gains or (losses). Attach Form 4797	14	
15a	IRA distributions	15a	
b	Taxable amount	15b	
16a	Pensions and annuities	16a	
b	Taxable amount	16b	
17	Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E	17	
18	Farm income or (loss). Attach Schedule F	18	
19	Unemployment compensation	19	8.
20a	Social security benefits	20a	
b	Taxable amount	20b	
21	Other income. List type and amount	21	
22	Combine the amounts in the far right column for lines 7 through 21. This is your total income ▶	22	63,249.

Adjusted Gross Income

23	Educator expenses	23	
24	Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ	24	
25	Health savings account deduction. Attach Form 8889	25	
26	Moving expenses. Attach Form 3903	26	
27	Deductible part of self-employment tax. Attach Schedule SE	27	2,694.
28	Self-employed SEP, SIMPLE, and qualified plans	28	
29	Self-employed health insurance deduction	29	
30	Penalty on early withdrawal of savings	30	
31a	Alimony paid b Recipient's SSN ▶	31a	
32	IRA deduction	32	12,000.
33	Student loan interest deduction	33	
34	Tuition and fees. Attach Form 8917	34	
35	Domestic production activities deduction. Attach Form 8903	35	
36	Add lines 23 through 35	36	14,694.
37	Subtract line 36 from line 22. This is your adjusted gross income ▶	37	48,555.

38	Amount from line 37 (adjusted gross income)		38	48,555.
Tax and Credits				
39a	Check <input type="checkbox"/> You were born before January 2, 1951, <input type="checkbox"/> Blind. Total boxes checked <input type="checkbox"/> 39a			
	if: <input type="checkbox"/> Spouse was born before January 2, 1951, <input type="checkbox"/> Blind.			
b	If your spouse itemizes on a separate return or you were a dual-status alien, check here <input type="checkbox"/> 39b			
40	Itemized deductions (from Schedule A) or your standard deduction (see left margin)		40	12,600.
41	Subtract line 40 from line 38		41	35,955.
42	Exemptions. If line 38 is \$154,950 or less, multiply \$4,000 by the number on line 6d. Otherwise, see instructions		42	20,000.
43	Taxable income. Subtract line 42 from line 41. If line 42 is more than line 41, enter -0-		43	15,955.
44	Tax (see instructions). Check if any from: a <input type="checkbox"/> Form(s) 8814 b <input type="checkbox"/> Form 4972 c <input type="checkbox"/>		44	1,598.
45	Alternative minimum tax (see instructions). Attach Form 6251		45	
46	Excess advance premium tax credit repayment. Attach Form 8962		46	
47	Add lines 44, 45, and 46		47	1,598.
48	Foreign tax credit. Attach Form 1116 if required	48		
49	Credit for child and dependent care expenses. Attach Form 2441	49		
50	Education credits from Form 8863, line 19	50		
51	Retirement savings contributions credit. Attach Form 8880	51	400.	
52	Child tax credit. Attach Schedule 8812, if required	52	1,198.	
53	Residential energy credits. Attach Form 5695	53		
54	Other credits from Form: a <input type="checkbox"/> 3800 b <input type="checkbox"/> 8801 c <input type="checkbox"/>	54		
55	Add lines 48 through 54. These are your total credits	55	1,598.	
56	Subtract line 55 from line 47. If line 55 is more than line 47, enter -0-	56	0.	
57	Self-employment tax. Attach Schedule SE	57	5,388.	
58	Unreported social security and Medicare tax from Form: a <input type="checkbox"/> 4137 b <input type="checkbox"/> 8919	58		
59	Additional tax on IRAs, other qualified retirement plans, etc. Attach Form 5329 if required	59		
60a	Household employment taxes from Schedule H	60a		
b	First-time homebuyer credit repayment. Attach Form 5405 if required	60b		
61	Health care: individual responsibility (see instructions) Full-year coverage <input checked="" type="checkbox"/>	61		
62	Taxes from: a <input type="checkbox"/> Form 8959 b <input type="checkbox"/> Form 8960 c <input type="checkbox"/> Instructions; enter code(s)	62		
63	Add lines 56 through 62. This is your total tax	63	5,388.	

Other Taxes

Payments

If you have a qualifying child, attach Schedule EIC.

64	Federal income tax withheld from Forms W-2 and 1099	64	1,673.
65	2015 estimated tax payments and amount applied from 2014 return	65	
66a	Earned income credit (EIC) <input type="checkbox"/> No <input type="checkbox"/> Yes	66a	
b	Nontaxable combat pay election <input type="checkbox"/> 66b		
67	Additional child tax credit. Attach Schedule 8812	67	1,802.
68	American opportunity credit from Form 8863, line 8	68	
69	Net premium tax credit. Attach Form 8962	69	3,680.
70	Amount paid with request for extension to file	70	
71	Excess social security and tier 1 RRTA tax withheld	71	
72	Credit for federal tax on fuels. Attach Form 4136	72	
73	Credits from Form: a <input type="checkbox"/> 2439 b <input checked="" type="checkbox"/> Reserved c <input type="checkbox"/> 8885 d <input type="checkbox"/>	73	
74	Add lines 64, 65, 66a, and 67 through 73. These are your total payments	74	7,155.

Refund

Direct deposit? See instructions.

75	If line 74 is more than line 63, subtract line 63 from line 74. This is the amount you overpaid	75	1,767.
76a	Amount of line 75 you want refunded to you. If Form 8888 is attached, check here <input type="checkbox"/>	76a	1,767.
b	Routing number <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X	c Type: <input type="checkbox"/> Checking <input type="checkbox"/> Savings	
d	Account number <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X <input checked="" type="checkbox"/> X		
77	Amount of line 75 you want applied to your 2016 estimated tax	77	

Amount You Owe

78	Amount you owe. Subtract line 74 from line 63. For details on how to pay, see instructions	78	
79	Estimated tax penalty (see instructions)	79	

Third Party Designee

Do you want to allow another person to discuss this return with the IRS (see instructions)? ☐ Yes. Complete below. ☒ No

Designee's name _____ Phone no. _____ Personal identification number (PIN) _____

Sign Here

Joint return? See instructions. Keep a copy for your records.

Under penalties of perjury, I declare that I have examined this return and accompanying schedules and statements, and to the best of my knowledge and belief, they are true, correct, and complete. Declaration of preparer (other than taxpayer) is based on all information of which preparer has any knowledge.

Your signature	Date	Your occupation	Daytime phone number
		attorney	(415) 867-5797
Spouse's signature. If a joint return, both must sign.	Date	Spouse's occupation	If the IRS sent you an Identity Protection PIN, enter it here (see inst.)
		clerk	

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name	Self-Prepared	Firm's EIN		
Firm's address		Phone no.		

For the year Jan. 1–Dec. 31, 2016, or other tax year beginning

2016, ending

20

See separate instructions.

Your first name and initial

DEMAS W

Last name

YAN

Your social security number

XXX-XX-5968

If a joint return, spouse's first name and initial

MEI

Last name

FANG

Spouse's social security number

XXX-XX-0299

Home address (number and street), if you have a P.O. box, see instructions.

1433 7TH AVENUE

Apt. no.

▲ Make sure the SSN(s) above and on line 6c are correct.

City, town or post office, state, and ZIP code. If you have a foreign address, also complete spaces below (see instructions).

SAN FRANCISCO CA 94122

Foreign country name

Foreign province/state/country

Foreign postal code

Presidential Election Campaign

Check here if you, or your spouse if filing jointly, want \$3 to go to this fund. Checking a box below will not change your tax or refund. ☐ You ☐ Spouse

Filing Status

1 ☐ Single2 ☒ Married filing jointly (even if only one had income)3 ☐ Married filing separately. Enter spouse's SSN above and full name here. ▶4 ☐ Head of household (with qualifying person). (See instructions.) If the qualifying person is a child but not your dependent, enter this child's name here. ▶5 ☐ Qualifying widow(er) with dependent child

Exemptions

6a ☒ Yourself. If someone can claim you as a dependent, do not check box 6ab ☒ Spouse

c Dependents:

(1) First name	Last name	(2) Dependent's social security number	(3) Dependent's relationship to you	(4) <input checked="" type="checkbox"/> If child under age 17 qualifying for child tax credit (see instructions)
C	YAN	XXX-XX-9865	Daughter	<input checked="" type="checkbox"/>
M	YAN	XXX-XX-1556	Daughter	<input checked="" type="checkbox"/>
I	YAN	XXX-XX-7276	Daughter	<input checked="" type="checkbox"/>
				<input type="checkbox"/>

If more than four dependents, see instructions and check here ☐

d Total number of exemptions claimed

Boxes checked on 6a and 6b 2

No. of children on 6c who:

• lived with you 3

• did not live with you due to divorce or separation (see instructions)

Dependents on 6c not entered above

Add numbers on lines above ▶ 5

Income

7 Wages, salaries, tips, etc. Attach Form(s) W-2 7 47,390.

8a Taxable interest. Attach Schedule B if required 8a

b Tax-exempt interest. Do not include on line 8a 8b

9a Ordinary dividends. Attach Schedule B if required 9a

b Qualified dividends 9b

10 Taxable refunds, credits, or offsets of state and local income taxes 10 0.

11 Alimony received 11

12 Business income or (loss). Attach Schedule C or C-EZ 12 23,109.

13 Capital gain or (loss). Attach Schedule D if required. If not required, check here ☐ 13 -3,000.

14 Other gains or (losses). Attach Form 4797 14

15a IRA distributions 15a b Taxable amount 15b

16a Pensions and annuities 16a b Taxable amount 16b

17 Rental real estate, royalties, partnerships, S corporations, trusts, etc. Attach Schedule E 17

18 Farm income or (loss). Attach Schedule F 18

19 Unemployment compensation 19

20a Social security benefits 20a b Taxable amount 20b

21 Other income. List type and amount 21

22 Combine the amounts in the far right column for lines 7 through 21. This is your total income ▶ 22 67,499.

Adjusted Gross Income

23 Educator expenses 23

24 Certain business expenses of reservists, performing artists, and fee-basis government officials. Attach Form 2106 or 2106-EZ 24

25 Health savings account deduction. Attach Form 8889 25

26 Moving expenses. Attach Form 3903 26

27 Deductible part of self-employment tax. Attach Schedule SE 27 1,633.

28 Self-employed SEP, SIMPLE, and qualified plans 28

29 Self-employed health insurance deduction 29 2,165.

30 Penalty on early withdrawal of savings 30

31a Alimony paid b Recipient's SSN ▶ 31a

32 IRA deduction 32

33 Student loan interest deduction 33

34 Tuition and fees. Attach Form 8917 34

35 Domestic production activities deduction. Attach Form 8903 35

36 Add lines 23 through 35 36 3,798.

37 Subtract line 36 from line 22. This is your adjusted gross income ▶ 37 63,701.

REV 01/25/17 TTW Form **1040** (2016)

Exhibit B

Re: Case No.11-cv-01814

From: crystal lei (crystalleija@yahoo.com)

To: billmori2@gmail.com; anewlaw@gmail.com

Date: Thursday, July 26, 2018, 10:29 AM PDT

Gentlemen, please see the attached file.

Crystal

On Sunday, July 22, 2018, 1:31:30 PM PDT, Bill Mori <billmori2@gmail.com> wrote:

returns for the years 2016, 2015 and 2014



rejection of untrue tax return and demand for compliance.PDF

26kB

VIA EMAIL ONLY

To: Mr. Demas Yan

From: Crystal Lei

Date: July 26, 2018

Re: Rejection of untrue tax returns and
demand for compliance with the Court Order of Feb. 9, 2018

Mr. Demas Yan,

On July 22, 2018, I have received an email from billmori2@gmail.com containing your purported tax returns of 6 pages for the years 2014, 2015, and 2016.

These tax returns are not true and genuine copies of Demas Yan's tax returns for the years of 2014, 2015, and 2016 filed with the IRS. They are unacceptable and are rejected.

I hereby demand that you produce to me, per order of the Court, the complete and unaltered (with all attachments and schedules) copies of the originals (submitted to the IRS) of your tax returns for the years of 2014, 2015, and 2016. Or by using the attached IRS Form 4506, fill it out, sign it, and then return it to me.

Please note that the \$500 per day sanction shall continue to run until the day of your full compliance with the Court order of February 9, 2018.

Sincerely,

A handwritten signature in black ink, appearing to be 'Crystal Lei', with a horizontal line extending to the right.

Crystal Lei

Attachment: IRS Form 4506

Form **4506**

(July 2017)

Department of the Treasury
Internal Revenue Service**Request for Copy of Tax Return**

- Do not sign this form unless all applicable lines have been completed.
 ► Request may be rejected if the form is incomplete or illegible.
 ► For more information about Form 4506, visit www.irs.gov/form4506.

OMB No. 1545-0429

Tip. You may be able to get your tax return or return information from other sources. If you had your tax return completed by a paid preparer, they should be able to provide you a copy of the return. The IRS can provide a **Tax Return Transcript** for many returns free of charge. The transcript provides most of the line entries from the original tax return and usually contains the information that a third party (such as a mortgage company) requires. See **Form 4506-T, Request for Transcript of Tax Return**, or you can quickly request transcripts by using our automated self-help service tools. Please visit us at IRS.gov and click on "Get a Tax Transcript..." or call 1-800-908-9946.

1a Name shown on tax return. If a joint return, enter the name shown first.	1b First social security number on tax return, individual taxpayer identification number, or employer identification number (see instructions)
2a If a joint return, enter spouse's name shown on tax return.	2b Second social security number or individual taxpayer identification number if joint tax return
3 Current name, address (including apt., room, or suite no.), city, state, and ZIP code (see instructions)	
4 Previous address shown on the last return filed if different from line 3 (see instructions)	
5 If the tax return is to be mailed to a third party (such as a mortgage company), enter the third party's name, address, and telephone number.	

Caution: If the tax return is being mailed to a third party, ensure that you have filled in lines 6 and 7 before signing. Sign and date the form once you have filled in these lines. Completing these steps helps to protect your privacy. Once the IRS discloses your tax return to the third party listed on line 5, the IRS has no control over what the third party does with the information. If you would like to limit the third party's authority to disclose your return information, you can specify this limitation in your written agreement with the third party.

6 Tax return requested. Form 1040, 1120, 941, etc. and all attachments as originally submitted to the IRS, including Form(s) W-2, schedules, or amended returns. Copies of Forms 1040, 1040A, and 1040EZ are generally available for 7 years from filing before they are destroyed by law. Other returns may be available for a longer period of time. Enter only one return number. If you need more than one type of return, you must complete another Form 4506. ► _____

Note: If the copies must be certified for court or administrative proceedings, check here ☐

7 Year or period requested. Enter the ending date of the year or period, using the mm/dd/yyyy format. If you are requesting more than eight years or periods, you must attach another Form 4506.

8 Fee. There is a \$50 fee for each return requested. Full payment must be included with your request or it will be rejected. Make your check or money order payable to "United States Treasury." Enter your SSN, ITIN, or EIN and "Form 4506 request" on your check or money order.	<div style="text-align: right;">\$</div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>
a Cost for each return	<div style="text-align: right;">\$</div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>
b Number of returns requested on line 7	<div style="text-align: right;">\$</div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>
c Total cost. Multiply line 8a by line 8b	<div style="text-align: right;">\$</div> <div style="border-bottom: 1px solid black; height: 15px; width: 100%;"></div>
9 If we cannot find the tax return, we will refund the fee. If the refund should go to the third party listed on line 5, check here <input type="checkbox"/>	

Caution: Do not sign this form unless all applicable lines have been completed.

Signature of taxpayer(s). I declare that I am either the taxpayer whose name is shown on line 1a or 2a, or a person authorized to obtain the tax return requested. If the request applies to a joint return, at least one spouse must sign. If signed by a corporate officer, 1 percent or more shareholder, partner, managing member, guardian, tax matters partner, executor, receiver, administrator, trustee, or party other than the taxpayer, I certify that I have the authority to execute Form 4506 on behalf of the taxpayer. **Note:** This form must be received by IRS within 120 days of the signature date.

☐ **Signatory attests that he/she has read the attestation clause and upon so reading declares that he/she has the authority to sign the Form 4506. See instructions.**

Phone number of taxpayer on line 1a or 2a

Sign Here

Signature (see instructions)	Date
Title (if line 1a above is a corporation, partnership, estate, or trust)	
Spouse's signature	Date

Exhibit C

FILED

Superior Court of California
County of San Francisco

APR 14 2018

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN FRANCISCO**

CLERK OF THE COURT

BY *[Signature]* Deputy Clerk

CHARLES LI

PLAINTIFF,

VS.

THAI MING CHIU et al

DEFENDANT.

Department: 504

Case Number: CGC-14-537574

VERDICT FORM

Verdict Form 1

We answer the questions submitted to us as follows:

1. Did Charles Li have a right to payment from Demas Yan?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Demas Yan transfer property to Cheuk Tin Yan?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Demas Yan transfer the property with the intent to hinder, delay, or defraud one or more of his creditors?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Demas Yan's conduct a substantial factor in causing Charles Li's harm?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Did Cheuk Tin Yan receive the property from Demas Yan in good faith?

☐ Yes ☒ No

If your answer to question 5 is yes, then answer question 6. If you answered no, skip question 6 and answer question 7.

6. Did Cheuk Tin Yan receive the property in exchange for a reasonably equivalent value?

☐ Yes ☐ No

If your answer to question 6 is yes, stop here, answer no further questions, and have the presiding juror sign and date this form. If you answered no, then answer question 7.

7. What are Charles Li's damages?

TOTAL \$ 824,180.57

Signed: *Seal F. Lla*

Presiding Juror

Dated: 4/14/16

After all verdict forms have been signed, notify the clerk that you are ready to present your verdict in the courtroom.

Verdict Form 2

We answer the questions submitted to us as follows:

1. Did Charles Li have a right to payment from Demas Yan?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Demas Yan transfer property to Cheuk Tin Yan?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Demas Yan fail to receive a reasonably equivalent value in exchange for the transfer?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did Charles Li's right to payment from Demas Yan arise before Demas Yan transferred property?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Was Demas Yan insolvent at that time or did Demas Yan become insolvent as a result of the transfer?

☒ Yes ☐ No

If your answer to question 5 is yes, then answer question 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. Was Demas Yan's conduct a substantial factor in causing Charles Li's harm?

☒ Yes ☐ No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. What are Charles Li's damages?

TOTAL \$ 824,180.57

Signed: _____

Presiding Juror

Dated: _____

4/14/16

After all verdict forms have been signed, notify the clerk that you are ready to present your verdict in the courtroom.

Verdict Form 3

We answer the questions submitted to us as follows:

1. Did Charles Li have a right to payment from Demas Yan?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Demas Yan transfer property to Tina Yan?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Demas Yan transfer the property with the intent to hinder, delay, or defraud one or more of his creditors?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Demas Yan's conduct a substantial factor in causing Charles Li's harm?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Did Tina Yan receive the property from Demas Yan in good faith?

☐ Yes ☒ No

If your answer to question 5 is yes, then answer question 6. If you answered no, skip question 6 and answer question 7.

6. Did Tina Yan receive the property in exchange for a reasonably equivalent value?

☐ Yes ☐ No

If your answer to question 6 is yes, stop here, answer no further questions, and have the presiding juror sign and date this form. If you answered no, then answer question 7.

7. What are Charles Li's damages?

TOTAL \$ 824,180.57

Signed: _____

Presiding Juror

Dated: _____

4/14/16

After all verdict forms have been signed, notify the clerk that you are ready to present your verdict in the courtroom.

Verdict Form 4

We answer the questions submitted to us as follows:

1. Did Charles Li have a right to payment from Demas Yan?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Demas Yan transfer property to Tina Yan?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Demas Yan fail to receive a reasonably equivalent value in exchange for the transfer?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did Charles Li's right to payment from Demas Yan arise before Demas Yan transferred property?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Was Demas Yan insolvent at that time or did Demas Yan become insolvent as a result of the transfer?

☒ Yes ☐ No

If your answer to question 5 is yes, then answer question 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. Was Demas Yan's conduct a substantial factor in causing Charles Li's harm?

☒ Yes ☐ No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. What are Charles Li's damages?

TOTAL \$ 824,180.57

Signed: 

Presiding Juror

Dated: 4/14/16

After all verdict forms have been signed, notify the clerk that you are ready to present your verdict in the courtroom.

Verdict Form 5

We answer the questions submitted to us as follows:

1. Did Charles Li have a right to payment from Demas Yan?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Demas Yan transfer property to Thai Ming Chiu?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Demas Yan transfer the property with the intent to hinder, delay, or defraud one or more of his creditors?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Demas Yan's conduct a substantial factor in causing Charles Li's harm?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Did Thai Ming Chiu receive the property from Demas Yan in good faith?

☐ Yes ☒ No

If your answer to question 5 is yes, then answer question 6. If you answered no, skip question 6 and answer question 7.

6. Did Thai Ming Chiu receive the property in exchange for a reasonably equivalent value?

☐ Yes ☐ No

If your answer to question 6 is yes, stop here, answer no further questions, and have the presiding juror sign and date this form. If you answered no, then answer question 7.

7. What are Charles Li's damages?

TOTAL \$ 324,167.58

Signed: _____

Stall
Presiding Juror

Dated: _____

4/14/16

After all verdict forms have been signed, notify the clerk that you are ready to present your verdict in the courtroom.

Verdict Form 6

We answer the questions submitted to us as follows:

1. Did Charles Li have a right to payment from Demas Yan?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Demas Yan transfer property to Thai Ming Chiu?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Demas Yan fail to receive a reasonably equivalent value in exchange for the transfer?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did Charles Li's right to payment from Demas Yan arise before Demas Yan transferred property?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Was Demas Yan insolvent at that time or did Demas Yan become insolvent as a result of the transfer?

☒ Yes ☐ No

If your answer to question 5 is yes, then answer question 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. Was Demas Yan's conduct a substantial factor in causing Charles Li's harm?

☒ Yes ☐ No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. What are Charles Li's damages?

TOTAL \$ 324,167.58

Signed: _____


Presiding Juror

Dated: _____

4/14/16

After all verdict forms have been signed, notify the clerk that you are ready to present your verdict in the courtroom.

Verdict Form 7

We answer the questions submitted to us as follows:

1. Did Charles Li have a right to payment from Demas Yan?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Demas Yan transfer property to Kaman Liu?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Demas Yan transfer the property with the intent to hinder, delay, or defraud one or more of his creditors?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Was Demas Yan's conduct a substantial factor in causing Charles Li's harm?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Did Kaman Liu receive the property from Demas Yan in good faith?

☐ Yes ☒ No

If your answer to question 5 is yes, then answer question 6. If you answered no, skip question 6 and answer question 7.

6. Did Kaman Liu receive the property in exchange for a reasonably equivalent value?

☐ Yes ☐ No

If your answer to question 6 is yes, stop here, answer no further questions, and have the presiding juror sign and date this form. If you answered no, then answer question 7.

7. What are Charles Li's damages?

TOTAL \$ 72,037.24

Signed: S Fall

Presiding Juror

Dated: 4/14/16

After all verdict forms have been signed, notify the clerk that you are ready to present your verdict in the courtroom.

Verdict Form 8

We answer the questions submitted to us as follows:

1. Did Charles Li have a right to payment from Demas Yan?

☒ Yes ☐ No

If your answer to question 1 is yes, then answer question 2. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

2. Did Demas Yan transfer property to Kaman Liu?

☒ Yes ☐ No

If your answer to question 2 is yes, then answer question 3. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

3. Did Demas Yan fail to receive a reasonably equivalent value in exchange for the transfer?

☒ Yes ☐ No

If your answer to question 3 is yes, then answer question 4. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

4. Did Charles Li's right to payment from Demas Yan arise before Demas Yan transferred property?

☒ Yes ☐ No

If your answer to question 4 is yes, then answer question 5. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

5. Was Demas Yan insolvent at that time or did Demas Yan become insolvent as a result of the transfer?

☒ Yes ☐ No

If your answer to question 5 is yes, then answer question 6. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

6. Was Demas Yan's conduct a substantial factor in causing Charles Li's harm?

☒ Yes ☐ No

If your answer to question 6 is yes, then answer question 7. If you answered no, stop here, answer no further questions, and have the presiding juror sign and date this form.

7. What are Charles Li's damages?

TOTAL \$ 72,037.24

Signed: S. Falla

Presiding Juror

Dated: 4/14/16

After all verdict forms have been signed, notify the clerk that you are ready to present your verdict in the courtroom.

Exhibit D

FILED
Superior Court of California
County of San Francisco

NOV 19 2018

CLERK OF THE COURT

BY: [Signature]

Duy Thai, SBN 157345
One Embarcadero Center, Suite 1020
San Francisco, California 94111
Tel: 415 296-9927
Fax: 415 230-5779

Attorney for Plaintiff Charles Li

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN FRANCISCO – UNLIMITED JURISDICTION

CHARLES LI, an individual,

Plaintiff,

v.

MEI LING FANG, a.k.a. LILY YAN, an
individual, DEMAS YAN, a.k.a. DENNIS
YAN, an individual, VI DAN TRAN, a.k.a.
DAN V. TRAN, an individual, DOES 1
through 50,

Defendants.

Case No.: CGC-18-571386

DECLARATION OF DUY THAI IN
SUPPORT OF PLAINTIFF'S EX
PARTE APPLICATION FOR
TEMPORARY RESTRAINING ORDER
AND ORDER TO SHOW CAUSE WHY
PRELIMINARY INJUNCTION
SHOULD NOT BE ENTERED

I, Duy Thai, declare as follows:

1. I am the attorney for plaintiff and judgment creditor Charles Li in this above-entitled matter. I make this declaration upon personal knowledge or, where so indicated, upon information and belief.

2. In *Li v. Yan*, CGC-10-497990 (San Francisco Superior Court), plaintiff Li obtained a judgment against defendant Demas Yan for unauthorized practice of law, attorney malpractice, and fraud. When he attempted to collect on the judgment, plaintiff found out that defendant Yan had transferred his only substantial locatable asset, a residential investment property at 547 23rd Avenue, San Francisco, California (the "Subject Property"), to his mother and two brother-in-laws as alleged repayment for

1 alleged loans he owed to them. Plaintiff then filed *Li v. Chiu, Yan, et al.*, CGC-14-537574
 2 (San Francisco Superior Court), to recover the property. This Court entered judgment
 3 restoring the Subject Property to Yan's title for plaintiff Li's judgment enforcement. The
 4 judgment was affirmed on May 31, 2018 by the court of appeal. *Li v. Chiu, Yan, et al.*,
 5 Appeal No. A149849.

6 3. Upon information and belief, defendant Mei Ling Fang is the wife
 7 of defendant Demas Yan. She has purportedly appointed defendant Vi Dan Tran as the
 8 trustee on a purported 2007 deed of trust (the "Purported Deed of Trust," attached herein
 9 as **Exhibit 1**) against the Subject Property. This Court in *Li v. Chiu, Yan, et al.*, CGC-14-
 10 537574, appointed a Receiver to manage the Subject Property and prepare it for sale for
 11 satisfaction of plaintiff's judgments. Defendants are attempting to interfere with the
 12 Receiver by foreclosing on the Subject Property under the Purported Trust Deed. They
 13 have recorded a Notice of Trustee's Sale to auction the Subject Property on November
 14 26, 2018, the Monday after the Thanksgiving weekend. **Exhibit 2**.

15 4. On September 16, 2018, at 9:50 a.m., I telephoned Dan V Auto
 16 Repair, 4848 MacArthur Boulevard, Oakland, California, 415 867-5797, the garage
 17 where defendant Vi Dan Tran has worked at. A female person answered and said she
 18 would pass on my message. She seemed to be taking careful notes as I gave notice that on
 19 September 19, 2018, at 11:00 a.m., in Department 302 of this Honorable Court, plaintiff
 20 Charles Li will apply for a temporary restraining order enjoining defendant Tran from
 21 conducting the scheduled trustee's sale on November 26, 2018 or thereafter. I have not
 22 received any response regarding whether anyone would oppose the application.

23 5. The person at Dan V Auto Repair told me defendant Tran was out
 24 of the country, and that she had not seen him in the two months since she worked there.
 25 However, she would give my notice to the person who "runs" the shop and pays her
 26 salary. That person, she said, was Dennis Yan, the name defendant Demas Yan
 27 frequently goes by.

1 6. I called Dan V Auto Repair because multiple public documents
2 connected the address of the garage to defendant Tran. Attached as **Exhibit 3** is an online
3 listing of the Better Business Bureau identifying Vi Dan Tran as the owner of the
4 business located at 4848 MacArthur Boulevard, Oakland, California. Attached as
5 **Exhibit 4** are Articles of Organization for Oakland Development, LLC, filed November
6 6, 2017, which was signed by Vi Tran and lists a business address of 4848 MacArthur
7 Boulevard, Oakland, California. Obviously, the name of the garage also tends to confirm
8 the connection.

9 7. Though I was surprised to learn that defendant Yan was running
10 defendant Tran's garage, there are other links between the two. Defendant Tran has been
11 a law client of defendant Yan. Attached as **Exhibit 5** to this declaration is a Stipulation to
12 Pay Judgment in Installments in *Advance Merchant Finance 1, LLC v. Harry's Oakland*
13 *Auto Service LLC*, RG15-767302 (Alameda County Superior Court), signed on July 12,
14 2017 by Vi D. Tran and Dennis Yan as his attorney. Attached as **Exhibit 6** is the website
15 of an entity called KVT USA Inc. that discloses Dennis Yan as "Consulting Lawyer" and
16 Vi Dan Tran as "Great U.S.A Public relation Manager" [sic].

17 8. Although the Notice of Trustee's Sale, attached as **Exhibit 2**, was
18 recorded on November 1, 2018 with the purported signature of defendant Tran, that
19 signature differs radically from his purported signature of on the Oakland Development,
20 LLC Articles of Organization, **Exhibit 4**, and the one in the Stipulation to Pay Judgment
21 in Installments. **Exhibit 5**.

22 9. During my taking of multiple depositions and debtor's
23 examinations, Defendant Yan repeatedly claimed that he was separated from defendant
24 Fang and that he did not even know where she lived. However, when plaintiff's process
25 server conducted a stake-out to serve her an order of examination issued, it was
26 confirmed that she currently lives with him and apparently has lived with him all along.

27 10. Most egregiously, defendant Yan disobeyed multiple Orders of this
28

1 Court to produce his tax returns, even after he lost an appeal in a published decision, *Li v.*
 2 *Yan*, 247 Cal.App.4th 56 (2016). Yan then claimed that the tax returns would reveal a
 3 joint filer, took a second appeal, and lost again. *Li v. Yan*, Appeal No. A151549. He
 4 finally admitted, only through appellate counsel at the oral arguments, that the joint filer
 5 was Mei Ling Fang, a person whose whereabouts he had claimed he did not even know.

6 11. Defendant Yan previously testified definitively that he owed no
 7 debt to his wife, **Exhibit 7**, p. 14, that he was not aware of any claims she had against
 8 him or his properties, **Exhibit 8**, p. 13, that she came to the United States from China the
 9 same year they got married, **Exhibit 9**, p. 6-9, that he was not aware of any separate
 10 property that she owned at the time, **Exhibit 10**, p. 6, that she never transferred any
 11 property or assets to him, **Exhibit 10**, p. 6, and that she did not work during the time they
 12 were married. **Exhibit 9**, p. 6-9. It can be reasonably surmised that defendant Yan has
 13 been channeling his income and assets through his wife, and that the tax returns would
 14 expose the deception.

15 12. Defendant Yan in fact had completely forgotten about the
 16 Purported Deed of Trust. He was stumped in an examination and emphatically testified:
 17 “There is no obligation. As far as I can remember, there is no promissory note that goes
 18 with this.” He further testified: “But all I know for sure is this is probably not a valid
 19 deed of trust because there is no – there is nothing in exchange for it. Like I said, I didn’t
 20 know it was recorded.” And: “I didn’t know that it was recorded. It wasn’t intended to be
 21 recorded. There is no reason. And I think I searched the record recently. I haven’t seen
 22 this. I forgot about this.” **Exhibit 11**, p. 47-49.

23 13. Attached as **Exhibit 12** is a declaration defendant Yan submitted at
 24 the trial in *Li v. Chiu*, in which he stated, “There was no promissory note accompanying
 25 the Deed.” Based upon that declaration, the defendants in that case argued that “without a
 26 promissory note, a Deed of Trust is ineffective. [...] It has no legal effect.” **Exhibit 13**.
 27 At trial, Yan testified before the jury:
 28

1 16 My understanding today is that this document
2 17 would be a useless piece of document. It's not
3 18 enforceable.
4 19 Q. And you say it's unenforceable, because there
5 20 was no such \$1,500,000 debt, correct?
6 21 A. Correct.

7 **Exhibit 14**, p. 117.

8 14. Defendant Yan was in an epic bankruptcy that lasted
9 approximately 2004 to 2012. In preparing for the two trials related to this matter, my
10 office combed Yan's voluminous bankruptcy file. I saw no hint that Mr. Yan ever
11 obtained a \$1.5 million loan in the middle of his bankruptcy. Indeed, he would have
12 needed permission of the bankruptcy court or his bankruptcy trustee to take out any
13 additional debt or encumber any of his assets at the time. No such request or permission
14 was in the record. Defendant Yan admitted at trial that he never disclosed the Purported
15 Deed of Trust to the bankruptcy trustee. **Exhibit 14**, p. 118. As was litigated in *Li v.*
16 *Chiu*, Yan during his bankruptcy had advanced three other alleged loans from his
17 relatives, for smaller amounts, which the bankruptcy court all rejected as invalid and
18 unsubstantiated.

19 15. Defendant Fang has signed the foreclosure-related documents in a
20 variety of contradictory purported capacities. She signed a first Substitution of Trustee on
21 July 16, 2018 as the beneficiary of the Purported Deed of Trust. **Exhibit 15**. She signed
22 the same-dated Declaration of Mortgage Servicer as "agent for Beneficiary SHUZHEN
23 TU." **Exhibit 16**, p. 3. She signed a second Substitution of Trustee, the one appointing
24 defendant Tran, as "Attorney-in-Fact for Beneficiary SHUZHEN TU." **Exhibit 17**.
25 However, the Purported Deed of Trust identified only defendant Fang as the beneficiary,
26 and there is no recorded assignment of that instrument.

27 16. On November 15, 2015, this Court ordered defendant Yan to be
28

1 put on the state's vexatious litigants list. On January 28, 2016, he was sanctioned
 2 \$9,000.00 by the court of appeal for his vexatious appeal of Li v. Yan, Appeal No.
 3 A140798, which he has refused to pay. Defendant Yan was ordered disbarred by the
 4 California Supreme Court on March 16, 2018 for multiple ethical breaches and moral
 5 turpitude against multiple parties, including plaintiff Li.

6 17. An emergency exists supporting plaintiff's application for ex parte
 7 relief because the trustee's sale is impending and threatens to cause irreparable harm to
 8 plaintiff. Plaintiff did not delay because his counsel has had to investigate and pierce
 9 through a blizzard of names, entities, and documents that defendant Yan has thrown up.
 10 Plaintiff has attempted to take the order of examination of defendant Fang, but she has
 11 refused to appear. The attempt to investigate Vi Dan Tran was also extremely difficult.

12 18. Attached as exhibits to this declaration are true and correct copies
 13 of the following documents:
 14

Exhibit	Description
1	Deed of Trust with Assignment of Rents as Additional Security, recorded December 3, 2007
2	Notice of Trustee's Sale, recorded November 1, 2018
3	Entry for Dan's Auto Repair, 4848 macarthur Boulevard, Oakland, California, on Better Business Bureau website
4	Articles of Organization, Oakland Development, LLC, filed November 6, 2017
5	Stipulation to Pay Judgment in Installments, <i>Advance Merchant Finance 1, LLC v. Harry's Oakland Auto Service LLC</i> , RG15-767302 (Alameda County Superior Court), signed on July 12, 2017
6	Website of KVT USA Inc., http://www,kvtusa.com/
7	Excerpts of Order of Examination of Demas Yan, March 11, 2015

8	Excerpts of Order of Examination of Demas Yan, April 21, 2015
9	Excerpts of Order of Examination of Demas Yan, June 4, 2013
10	Excerpts of Order of Examination of Demas Yan, April 30, 2015
11	Excerpts of Order of Examination of Demas Yan, May 19, 2015
12	Declaration of Demas Yan, <i>Li v. Chiu</i> , CGC-14-537574, July 24, 2015
13	Defendants' Motion in Limine No. 5, <i>Li v. Chiu</i> , CGC-14-537574, March 15, 2016
14	Excerpts of Reporter's Transcript of trial in <i>Li v. Chiu</i> , CGC-14-537574, April 7, 2016
15	Substitution of Trustee, recorded July 18, 2018
16	Notice of Default and Election to Sell Under Deed of Trust, recorded July 18, 2018
17	Substitution of Trustee, undated but recorded September 24, 2018

I declare under penalty of perjury under the laws of California that the foregoing is true and correct and that this declaration was executed in San Francisco, California, on November 19, 2018.



Duy Thai
Attorney for Plaintiff Charles Li

Exhibit E



土地註冊處
The Land Registry
Land Registrar
13/06/2017

**MEMORIAL of an instrument to be registered in the Land Registry
under the Land Registration Ordinance**

依據土地註冊條例在土地註冊處註冊的文書之註冊摘要

Solicitors Code of lodging firm 文件文書接辦律師行代號 09382601	Please tick the appropriate box (以適當方格填上) Registration Fee 註冊費用 <input type="checkbox"/> \$210 <input checked="" type="checkbox"/> \$230 <input type="checkbox"/> \$450 <input type="checkbox"/> \$1000 <input type="checkbox"/> \$2000 Nature and object of the instrument (文書的性質及目的) 文書的性質及目的 ASSIGNMENT	Stamp Office reference number 註冊摘要編號 15042902390442 Received On 接收日期 12/06/2015
Property Reference Number (if any) 物業參考編號(如有的話) 31314594 Address (if applicable) (including the address in the Chinese language, if known) 地址(如適用-包括所知道的中文地址) FLAT 4 ON 40/F OF BLOCK C TIN FU COURT 15 TIN SAU ROAD YUEN LONG NEW TERRITORIES	Undivided Shares (if any) 所佔的不分股份數(如有的話) 60/329481 Lot Number(s) 地段編號 TIN SHUI WAI TOWN LOT NO.22	Date of instrument 文書日期 15/06/2015 Consideration 代價 HK\$2,810,000.00
Names of parties (including the names in the Chinese language, if known) 各方的姓名或名稱(包括所知道的中文姓名或名稱) YAN DEMAS WAI (甄建興) CHOW CHUNG MING (周煥明)	In case of change of ownership, please specify identification numbers of parties (Identify Card No./Travel Document No./Company No./etc.) 如涉及權轉讓，請註明各方的身分識別號碼(如身分證號碼、旅行證件號碼、公司編號等) H.K.I.C. NO.F402485(4) H.K.I.C. NO.Z217129(6)	Status of parties (Assignments) 各方的身分(出讓/受讓) The Vendor The Purchaser
Memorial number (including district code, if applicable) 註冊摘要編號(包括區碼，如適用) 15042902390442	Stamp Office reference number 註冊摘要編號 3-16-049688-B-6-X	Stamp Office reference number 註冊摘要編號 42150.00

On this 15th day of June, 2015, I, Yan Demas Wai (甄建興), of the first part, do hereby certify that the foregoing Memorial contains a true and correct account of the several particulars therein set forth as required by the Land Registration Ordinance.

在(此)上這註冊摘要，是據其內所列各事項的確實事實敘述，以符合《土地註冊條例》的規定。

T.K. TSUI & CO
 律師行
 香港
 15/06/2015



印花稅局
Inland Revenue Department
稅務大樓
Tax Tower
電話號碼 Tel No: (2594) 3202
傳真號碼 Fax No: 2519 9025

INLAND REVENUE DEPARTMENT
Stamp Office
稅務大樓
Tax Tower
電話號碼 Tel No: (2594) 3202
傳真號碼 Fax No: 2519 9025

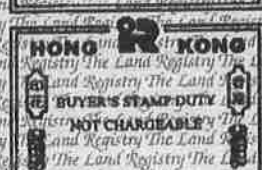
印花證明書 STAMP CERTIFICATE

此印花證明書是法(印花稅條例)發出,具有與傳統印花相等的法律地位
This stamp certificate is issued under the Stamp Duty Ordinance and has the same legal status as conventional stamp
(此證明書必須貼於下列文書上,作為已加蓋印花的憑證。 This certificate must be attached to the instrument shown below as evidence of payment.)

文書編號 Instrument Ref. No: 03-16-048688-0-0-R
文書性質 Nature of Instrument: 樓宇買賣契 (Property Assignment)
文書簽立日期 Date of Instrument: 15/05/2015 (15 May 2015)
代價或代價 Consideration: \$2,810,000.00
取得之權益 Interest acquired: 100.00%

物業地址 Property Address: FLAT 4 ON 40/F OF BLOCK C, TUN FU COURT, YUEN LONG NT
有關人士姓名及身份 Name and capacity of parties:
賣方 Vendor(s): (1) YAN DEMAS WAI
買方 Purchaser(s): (1) CHOW CHUNG MING

在證明上述文書已加蓋印花。 註如下:
This is to certify that the above instrument is stamped / endorsed as below:
印花證明書編號 Stamp Certificate No: 16-3-0095829-5
加蓋印花日期 Date of Stamping: 08/06/2015 (8 June 2015)
已付印花稅 Stamp Duty Paid: \$42,150.00
已付特別印花稅 Special Stamp Duty Paid: 不須支付 / Not chargeable
已付買家印花稅 Buyer's Stamp Duty Paid: 不須支付 / Not chargeable
付款方式 Payment Method: 其他 Others



印花稅局長 黃偉權
Collector of Stamp Revenue
WONG Kwan-kin

THIS ASSIGNMENTis made the 15th day of May 2015**BETWEEN**

(1) **YAN DEMAS WAI (甄維振)** of Room 1806 Lung Yan House, Kam Lung Court, Ma On Shan, Shatin, New Territories, Hong Kong ("the Vendor"); and

(2) **CHOM CHUNG MING (周鎮明)** of Flat 4/40th Floor, Block C, Tin Fu Court, 15 Tin Sau Road, Yuen Long, New Territories ("the Purchaser")

WHEREAS the Purchaser is a prescribed nominee with the definition set out in Paragraph 1A of the Schedule to the Housing Ordinance (Cap.283), who is nominated by the Hong Kong Housing Authority to purchase the Property as hereinafter defined subject to the terms, covenants and conditions in the Schedule to the Housing Ordinance (Cap.283).

NOW THIS DEED WITNESSETH as follows

1. In consideration of the sum of HONG KONG DOLLARS TWO MILLION EIGHT HUNDRED AND TEN THOUSAND ONLY (HK\$2,810,000.00) paid by the Purchaser to the Vendor (the receipt whereof is acknowledged by the Vendor as Beneficial Owner) ASSIGN to the Purchaser the land described in the Schedule hereto (the Property) TO HOLD the same unto the Purchaser for the residue of the term of years created by the Government Lease referred to in the Schedule SUBJECT to the payment of a due proportion of the yearly Government rent reserved by and the covenants conditions and provisos contained in the Government Lease AND SUBJECT to and with the benefit of a Deed of Mutual Covenant registered in the Land Registry by Memorial No YL947072 ("the Deed of Mutual Covenant").

2. This Assignment is subject to the terms covenants and conditions (hereinafter called the said Terms, Covenants and Conditions) contained in the Schedule to the Housing Ordinance (Cap.283) and any amendments thereto.

3. The Purchaser hereby covenants with the Vendor as follows

(1) The Purchaser will observe and perform the covenants terms and conditions by and in the Deed of Mutual Covenant reserve and contained and will indemnify the Vendor against all actions suits expenses claims and demands on account of or in

respect of the non-observance or non-performance of the said covenants, terms and conditions or any of them.

(2) In the event that the Purchaser wishes to sell the Property and The Hong Kong Housing Authority ("the Authority") or its nominee (which expression shall, for the purpose of this Clause 3(2), exclude a prescribed nominee as defined in the said Terms, Covenants and Conditions) wishes to purchase the Property in accordance with the said Terms Covenants and Conditions, the Authority shall, within twenty-eight days of receiving the Purchaser's notice of intended sale, serve upon the Purchaser at the address of the Property (or at the address specified for the purpose in such notice of intended sale), a notice of acceptance in writing to that effect, in which event completion of the sale shall be effected by the Purchaser within such time as shall be specified by the Authority or its nominee in writing, by entering into a deed of assignment of the Property in a form approved by the Authority and delivering vacant possession of the Property to the Authority or its nominee.

4. The Purchaser HEREBY COVENANTS with the Authority that the Purchaser acknowledges the rights conferred on the Authority (and its successors and assigns) under Clause 1(d), (h) and (i) of the Deed of Mutual Covenant to the intent that such covenant shall bind the Property and the owner or owners thereof for the time being and other person or persons deriving title under the Purchaser (each and all of whom including the Purchaser is and are hereinafter included in the expression "the Covenanting Purchaser") and shall enure for the benefit of the said land (as defined in paragraph 1(a) of the Schedule) and the Estate (as defined in paragraph 1(a) of the Schedule) and be enforceable by the Authority and its successors and assigns and that the Covenanting Purchaser hereby expressly and irrevocably appoints the Authority to be his attorney and grants unto the Authority the full right power and authority to give all consents and to do all acts deeds matters and things and to execute and sign seal and as the acts deeds of the Covenanting Purchaser deliver such deeds and to sign such documents or instruments as may be necessary for the exercise of or incidental to the exercise of the rights conferred on the Authority as aforesaid with the full power of delegation, and the Covenanting Purchaser hereby further covenants to do all acts deeds matters and things and to execute sign seal and deliver such deed or deeds and to sign such documents or instruments as may be necessary to give effect to such appointment and grant AND in the event of the Covenanting Purchaser selling or otherwise disposing of the Property, the Covenanting Purchaser shall sell or otherwise dispose of the Property upon the condition that the purchaser or assignee thereof shall enter into the same binding covenants on terms similar in scope and extent as the covenants hereinbefore contained

5. It is hereby agreed and declared by the parties hereto that the respective covenants by the Vendor and the Purchaser implied by the Conveyancing and Property Ordinance (Cap.219) shall be construed and shall take effect so far as they affect or relate to the Property but not further or otherwise.

6. It is hereby certified that the transaction hereby effected does not form part of a larger transaction or of a series of transactions in respect of which the amount or value of the aggregate amount or value of the consideration exceeds HK\$3,000,000.00.

7. The Purchaser acknowledges that he is purchasing the Property subject to the liability for payment of premium as set out in paragraph 1 of the Schedule to the Housing Ordinance Cap.283. The Vendor declares that for the purpose of calculation of the amount of premium under paragraph 1(b) of the Schedule to the Housing Ordinance, the Initial Market Value and the Purchase Price of the Property are specified in Assignment Memorial No.YL960514 as HK\$1,650,400.00 and HK\$952,900.00 respectively.

IN WITNESS whereof the parties hereto have hereunto executed this Assignment the day and year first above written,

SCHEDULE

1. The Property

(a) Description, address, lot number, sections and undivided shares, etc.

ALL THOSE 60 equal undivided 329.4611 parts or shares of and in ALL THAT

piece or parcel of ground registered in the Land Registry as TIN SHUI WAI TOWN

LOT NO. 22 ("the Lot") And of and in the messuages erections and buildings thereon

known at the date hereof as "TIN FU COURT (天富苑)" ("the Estate")

TOGETHER with the sole and exclusive right and privilege to hold use occupy and

enjoy ALL THAT FLAT NO.4 on the 40TH FLOOR of BLOCK C of TIN FU

COURT (天富苑) (which Flat for the purpose of identification only is particularly

shown on the Floor Plan annexed to an Assignment registered in the Land Registry

by Memorial No YL960514 ("the Assignment")) and thereon coloured Pink

(b) Exceptions and reservations

Subject to all the exceptions and reservations (if any) as more particularly described,

mentioned and/or referred to in the Government Lease, the Deed of Mutual

Covenant and the Assignment

(c) Easements and other appurtenant rights the benefits of which is assigned with the

Property

All rights, rights of way (if any), privileges, easements and appurtenances belonging

or appertaining to the Property and other appurtenant rights (if any) as contained in

the Lease, the Deed of Mutual Covenant or any other instrument or instruments

registered in the Land Registry so far as the same affect the Property and are still

subsisting and capable of being enforced

(d) Easements and other appurtenant rights to which the Property is subject

All rights, rights of way, privileges and easements as contained in the Lease, the

Deed of Mutual Covenant or any other instrument or instruments registered in the

Land Registry so far as the same affect the Property and are capable of being

enforced and all subsisting rights, rights of way, privileges and easements to which

the Property is subject

2. The Government Lease

(a) Date 15th day of October, 1999

(b) Parties: The Government of the Hong Kong Special Administrative Region of the one part and The Hong Kong Housing Authority of the other part.

(c) Term: for the term of fifty years commencing on the 15th day of October 1999.

(d) Lot: Tin Shui Wai Town Lot No. 2.

(e) As varied by a Deed of Rectification dated the 30th day of December 2000 and registered in the Land Registry by Memorial No. 34,943,593.

SIGNED SEALED AND DELIVERED)

by the Vendor (having been previously

identified by production of his Hong Kong

Identity Card No. P402485(4)) in the

presence of

Man Wai Fung

Clark to Messrs. Pansy Leung Tang & Chua,

Solicitors, Hong Kong SAR.

INTERPRETED to the Vendor by

Man Wai Fung

Clark to Messrs. Pansy Leung Tang & Chua

Solicitors, Hong Kong SAR.

Thereby verify the signature of

Man Wai Fung

CHUA SIU WANG RAYMOND

Solicitor of PANSY LEUNG TANG & CHUA

Solicitors, HKSAR.

SIGNED, SEALED AND DELIVERED by

the Purchaser (Holder of Hong Kong

Identity Card No. Z217129(6) in the

presence of

CHUI TAK SHU
One of Messrs. T. & Co.
Solicitors, Hong Kong SAR

INTERPRETED to the Purchaser by

CHUI TAK SHU, One of Messrs. T. & Co. Solicitors, Hong Kong SAR, hereby verify the

CHUI TAK SHU
One of Messrs. T. & Co.
Solicitors, Hong Kong SAR

LAU CHUN HEI ANDY
Solicitor, Hong Kong SAR
T. & Co. Solicitors

Dated the 15th day of May, 2015

ASSIGNMENT

註冊摘要編號 Memorial No.

15061202860468

本文書於2015年5月12日在土地註冊處

以上述註冊摘要編號註冊

This instrument was registered the

Land Registry by the above Memorial

No. on 12 June 2015.

土地註冊處處長

Land Registrar

Messrs. T. K. Tsui & Co.

Solicitors

Room 502-5, Floor

HSBC Building Yuen Long

150-160 Castle Peak Road

Yuen Long, N.T.

Ref: Y844-L/15/15/P/P/W/khm

Exhibit F

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEMAS YAN,)
Appellant,) CASE NO.
vs.) 3:11-CV-01814-RS
TONY FU, CRYSTAL LEI,)
WEI SUEN, BRYANT FU,)
and STELLA HONG CHEN,)
Appellees.)

ORDER OF EXAMINATION RE:

DEMAS YAN

TUESDAY, JUNE 27, 2017

VOLUME 1; PAGES 1 - 80

HANNAH KAUFMAN & ASSOCIATES, INC.
Certified Shorthand Reporters
San Francisco Executive Park
150 Executive Park Blvd., Suite 4600
San Francisco, California 94134-3333
(415) 337-2077

Reported by:
CANDACE HOLROYD, CSR 137

Hannah Kaufman & Associates, Inc.

1
2
3 DEMAS YAN, appearing pursuant to an Order of
4 Examination on behalf of the Judgment Creditor Crystal
5 Lei, was duly sworn by the Clerk of the Court at the
6 United States District Court, Courtroom F, Fifth Floor,
7 350 Golden Gate Avenue, San Francisco, California; said
8 examination commencing at 9:14 A.M., TUESDAY, JUNE 27,
9 2017, before Candace Holroyd, Certified Shorthand
10 Reporter No. 1370.

11
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20
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24
25

Hannah Kaufman & Associates, Inc.

1 TUESDAY, JUNE 27, 2017; 9:00 AM

2

3

DEMAS YAN

4 having been first duly sworn by the Court Clerk,
5 testified as follows:

6

EXAMINATION

7

BY MR. SERLIN:

8

Q. All right. Could you please state your full
9 name for the record.

10

A. Demas Yan -- D-e-m-a-s; last name Yan, Y-a-n.

11

Q. Okay. What is your date of birth, please?

12

A. Before I begin, why is that guy Tony Fu here?

13

Q. Public hearing.

14

A. No. He cannot be here. The reason why is
15 because he try to kill me.

16

Q. We are in --

17

A. Him being here is intimidation. I also will
18 like to say there be a stay-away order against him.

19

Q. Well, this is a -- the record will reflect that
20 we are in Courtroom F of the federal courthouse in the
21 U.S. District Court in San Francisco, and everybody in
22 this courtroom --

23

A. And this guy -- excuse me, I need to put this
24 on -- this guy, Bryant Fu, who just came up here, he is
25 within five feet of me, this guy has intimidated me

1 other than the names of your children. She said every
2 question.

3 What is your full Social Security number,
4 please?

5 A. I am not sure that is what she said. Are you
6 sure?

7 Q. Yes. You are to answer every question. It is
8 an open book. That was exactly what she said.

9 And the only question that she said --

10 A. No, it is a safety concern for me as well. Want
11 to just hold this off and then we can clarify with the
12 judge?

13 Q. Okay. Does anybody besides you live at the 1433
14 7th Avenue address?

15 A. Yes.

16 Q. And who is that?

17 A. I already told you I have specific concern of
18 the people who live with me.

19 Q. So you are refusing to answer?

20 A. And the judge agreed I have reason for safety
21 concerns.

22 Q. No. The judge said the only thing that at this
23 moment the only thing you don't have to disclose is the
24 name of your minor children. Everything else.

25 So there are other people who live at the 1433

1 7th property. How many besides yourself?

2 A. One.

3 Q. Okay. Is that your wife?

4 A. No.

5 Q. Who is it?

6 A. Again, of safety concern, I cannot give out the
7 information.

8 Q. Are you married?

9 A. Yes.

10 Q. What is your wife's name?

11 A. I am separated.

12 Q. What's your wife's name?

13 A. I'm separated, so I have safety concern as well.

14 Q. How long have you been separated?

15 A. Pretty long time. I don't remember.

16 Q. A month?

17 A. Many years.

18 Q. Do you know where your wife lives?

19 A. No.

20 Q. When was the last time you had any contact with
21 her?

22 A. I don't remember.

23 Q. When did you get married?

24 A. Sometime in 2004.

25 Q. Where were you married?

1 Do you have a power attorney for any third
2 person?

3 A. So is that your question: Do I have a power of
4 attorney to sign anything for other people?

5 Q. For any third person, whether that is an
6 individual, entity, or otherwise.

7 A. Is that your question?

8 Q. Yes.

9 A. Okay.

10 No, I don't.

11 Q. In your bankruptcy that was filed some years
12 ago, you listed a flat in Hong Kong as part of your
13 property. Do you still own that?

14 A. No.

15 Q. What happened to it?

16 A. I have no ownership in that for many, many
17 years.

18 Q. What happened to it?

19 A. What happened to it?

20 Q. Right. You listed it as an asset in your
21 bankruptcy a few years ago. So, what happened to it
22 that you don't own it now?

23 A. It was sold.

24 Q. When was it sold?

25 A. Many years ago.

Hannah Kaufman & Associates, Inc.

1 Q. To whom did you sell it?

2 A. I don't remember the name.

3 Q. What were the terms of the sale?

4 A. I don't remember the terms.

5 Q. Do you remember how much you sold it for?

6 A. I believe it was around -- I don't remember the
7 amount now.

8 Q. Do you remember to whom you sold it?

9 A. No.

10 Q. So you don't know who you sold it to and you
11 don't know how much you got paid for it. Is that what
12 you are saying?

13 A. I said I don't remember.

14 Q. Do you have any documents relating to such sale?

15 A. No.

16 Q. You didn't -- so you didn't keep the purchase
17 agreement or any escrow records or anything like that?

18 A. No.

19 Q. If you needed to get those records, how would
20 you go about finding them?

21 A. I don't know.

22 Q. Other than the property in Hong Kong, have you
23 owned in whole or in part any other real property?

24 A. No.

25 Q. Okay. There was \$175,000 in surplus proceeds

1 that came out of your bankruptcy in 2012. Where did
2 that money go?

3 A. I don't remember.

4 Q. Pretty big sum of money, wouldn't you say?

5 A. For me, yes.

6 Q. Okay. So, when you -- and you got a check from
7 the bankruptcy trustee; correct?

8 A. I don't remember whether it was a check or not.

9 Q. Okay. Well, a check or a wire transfer, where
10 did you go?

11 A. I don't remember.

12 Q. Well, did it get put into a bank account?

13 A. I don't remember.

14 Q. You have 175,000 which you just admitted was a
15 large amount of money for you, you have no recollection
16 whether that money was taken out in cash, whether you
17 got a wire transfer -- is that what you are testifying?

18 A. I don't remember. That is my testimony.

19 Q. How long have you banked with Wells Fargo?

20 A. A few years, I believe.

21 Q. Did you ever bank with any financial institution
22 other than Wells Fargo?

23 A. No.

24 Q. Okay. So, your savings account, your checking
25 account, and your client trust account have been with

1 papers -- whether a driver's license, a student photo
2 ID -- from any country other than the United States?

3 A. Repeat the question again.

4 Q. Did you ever have identification card or
5 papers -- whether student ID, driver's license, anything
6 like that -- from any country other than the United
7 States?

8 A. Timeframe.

9 Q. In the last 10 years.

10 A. Last 10 years. Other than U.S.? Other than
11 documents from in U.S. -- from U.S.?

12 Q. Right.

13 A. No.

14 Q. Okay. Have you ever filed a joint tax return
15 with your wife?

16 A. Yes.

17 Q. When was the last time you did?

18 A. I think I -- in -- I have been filing jointly,
19 using her name, for the last few years, yes.

20 Q. Okay. Do you have copies of the tax returns
21 that you filed in the last few years?

22 A. No.

23 Q. Who has them?

24 A. I don't have them. And they would be
25 privileged.

Hannah Kaufman & Associates, Inc.

1 Q. So you don't keep copies of your tax returns?

2 A. No.

3 Q. Would your wife have copies of the joint tax
4 returns that you filed?

5 A. I don't think so.

6 Q. Okay. Well, didn't she sign them?

7 A. I cannot say.

8 Q. Well, if there is a joint tax return she would
9 have to sign them; right?

10 A. The tax returns would be privileged.

11 Q. That's not the question. Did she sign the joint
12 tax returns?

13 A. I cannot say.

14 Q. You don't know or you won't say?

15 A. I don't know.

16 Q. Okay. Does your wife have any notes or deeds of
17 trust in her favor?

18 A. No, not that I know of.

19 Q. Okay. Do your children have any notes or deeds
20 of trust in their favor?

21 A. No.

22 Q. Are there any deposit accounts in your
23 children's names over which you have signature
24 authority?

25 A. No.

1 Q. Do you know whether your children have any
2 deposit accounts?

3 A. No.

4 Q. Other than your interest in any law practice,
5 have you ever had an interest in any business in the
6 last 10 years?

7 A. No, I don't remember. I don't recall.

8 Q. Have you had signature authority over any bank
9 account -- strike that -- any deposit account outside of
10 the United States in the last 10 years?

11 A. Last 10 years? I don't think so.

12 Q. Okay. Have you ever had a bank account in Hong
13 Kong or China?

14 A. I think it is more than 10 years ago.

15 Q. Okay. Well, you owned the condominium in Hong
16 Kong in at least 2011 according to your bankruptcy
17 schedules. So were you collecting rents from that
18 property?

19 A. No.

20 Q. Who was?

21 A. I don't believe there was ever any rent.

22 Q. Did anybody live there in 2011?

23 A. I don't think so.

24 Q. So it just sat there empty?

25 A. I don't think -- I don't think I have interest.

Hannah Kaufman & Associates, Inc.

1 I think I sold it years before that.

2 Q. Well, you listed it as an asset in your
3 bankruptcy in 2011.

4 A. I don't recall that.

5 Q. I am just telling you that. So nobody lived
6 there at the Hong Kong condominium during the time that
7 you owned it?

8 A. No.

9 Q. Did anybody use it?

10 A. No.

11 Q. Okay. Isn't it true that you received about
12 \$2.8 million Hong Kong dollars in 2015?

13 A. No.

14 Q. Have you received any funds in Hong Kong dollars
15 in the last 10 years?

16 A. The question again.

17 Q. Have you received any funds in Hong Kong dollars
18 in the last 10 years?

19 A. I can't say. I don't recall.

20 Q. Okay. Did you have any ownership interest,
21 whether in whole or in part, in the 818 Green Street
22 property in San Francisco?

23 A. No.

24 Q. Is there some reason that your name appeared in
25 an advertisement for that property?

CERTIFICATE OF REPORTER

I, Candace Holroyd, Certified Shorthand Reporter
No. 1370, do hereby certify the following:

That the within-entitled ORDER OF EXAMINATION OF
DEMAS YAN was reported by me at the time and place
mentioned herein;

That I am not of counsel or attorney for any of
the parties in the caption, nor in any way interested in
the outcome of the cause named in said caption;

That the proceeding was transcribed by computer
by me or under my supervision to the best of my ability,
and that the within transcript is complete and correct.

DATED:

7-1-2017



CANDACE HOLROYD, CSR 1370

Exhibit G

Form 2

Cash Receipts And Disbursements Record

Case Number: 04-33526-7-T
Case Name: Demas Wai Yan

Trustee: Janina M. Hoskins (007880)
Bank Name: The Bank of New York Mellon
Account: 9200-00848764-66 - Checking Account
Blanket Bond: \$4,000,000.00 (per case limit)
Separate Bond: N/A

Taxpayer ID #: 75-6795037
Period Ending: 08/01/12

1 Trans. Date	2 {Ref #} / Check #	3 Paid To / Received From	4 Description of Transaction	T-Code	5 Receipts \$	6 Disbursements \$	7 Checking Account Balance
04/06/10		Wire in from JPMorgan Chase Bank, N.A. account 312084876466	Wire in from JPMorgan Chase Bank, N.A. account 312084876466	9999-000	3,590.82		3,590.82
04/13/10		From Account #92000084876422	Adjust Principal via TIA Rollover	9999-000	90,442.61		94,033.43
04/14/10	10127	Reidun Stromsheim	Interim fees per Order 3/15/10	3210-000		15,672.00	78,361.43
04/14/10	10128	Reidun Stromsheim	C. 7 expenses- Order 3/15/10	3220-000		333.92	78,027.51
06/04/10		ACCOUNT FUNDED: 92000084876423	transfer to CD	9999-000		75,000.00	3,027.51
03/01/11		From Account #92000084876423	Adjust Principal via TIA Rollover	9999-000	35,037.62		38,065.13
03/03/11	10129	INTERNATIONAL SURETIES, LTD.	BOND PREMIUM PAYMENT ON LEDGER BALANCE AS OF 03/03/2011 FOR CASE #04-33526-7, 2011 Blanket Bond Payment Bond # 016030864	2300-000		517.18	37,547.95
03/30/11		From Account #92000084876423	TIA transfer credit adjustment	9999-000	-2.00		37,545.95
03/31/11	10130	Reidun Stromsheim, Esq.	First Interim Post-Final Fees- Order 3/21/11- Dckt. 466	3210-000		36,226.50	1,319.45
03/31/11	10131	Reidun Stromsheim, Esq.	First Interim Post-Final Expenses 3/21/11- Dckt. 466	3220-000		611.94	707.51
10/12/11		From Account #92000084876422	close out mma and transfer to DDA re final distribution- payments	9999-000	340,257.24		340,964.75
10/14/11	10132	Reidun Stromsheim, Esq.	Final Fee Application- Order- Docket no. 488	3210-000		8,277.50	332,687.25
10/14/11	10133	Reidun Stromsheim, Esq.	Final Expenses- Allowed Order- Docket no. 488	3220-000		543.42	332,143.83
10/14/11	10134	Golden State Lumber	Payment in full on Levy and Judgment/Writ- paid from Debtor's Surplus	8100-002		17,765.60	314,378.23
10/14/11	10135	Sing Tao Newspapers (SF) Ltd	Payment from Debtor's surplus per Writ and Levy	8100-002		122,927.38	191,450.85
10/18/11	10136	Crystal Lei	Payment in full with interest to 10/18/11 on 3 Writs re CGC 07-467500	8100-002		16,411.16	175,039.69
11/08/11	10137	Demas Wai Yan	Surplus funds paid to Debtor after payment of claims and levies	8200-002		175,039.69	0.00

ACCOUNT TOTALS	469,326.29	469,326.29	\$0.00
Less: Bank Transfers	469,326.29	75,000.00	
Subtotal	0.00	394,326.29	
Less: Payments to Debtors		332,143.83	
NET Receipts / Disbursements	\$0.00	\$62,182.46	

Exhibit H



The State Bar of California

News Releases

Media Contact

Office of Communications | 415-538-2283 | barcomm@calbar.ca.gov

Demas Yan of San Francisco disbarred for making false representations to various courts and other misconduct



Tuesday, March 20, 2018 Categories: Attorney Discipline, Disbarments

Demas W. Yan [#257854], 54, of San Francisco was disbarred effective March 16, 2018. He was also ordered to notify all his clients of the discipline and perform other obligations under rule 9.20 of the California Rules of Court. Yan was found culpable on 27 counts of misconduct involving seven cases, in matters arising out of four separate notices of disciplinary charges issued between December 2014 and January 2017. Yan was found to have made numerous false representations to various courts, filing numerous frivolous unwarranted actions in bankruptcy court and civil court, failing to pay sanctions or obey other court orders, failing to report the imposition of sanctions to the State Bar and making false assertions to various courts including the 9th Circuit Court of Appeals. Yan has one prior disciplinary action. In 2013 he was suspended from practice for one year and placed on probation for three years for negligently misappropriating funds, comingling personal and client funds, representing adverse interests, and improperly receiving unemployment benefits.

Effective Discipline Date: March 16, 2018

Tags: San Francisco County